

UNITED STATES OF AMERICA,

- against -

PUNEET DIKSHIT,

*Defendant.*

Case No. 21 CR 760 (CM)

USDC SDNY
DOCUMENT
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### DEFENDANT'S MOTION FOR TEMPORARY RELEASE OF PASSPORT

Defendant, Puneet Dikshit, pro se, respectfully requests this court to allow a temporary release of the defendant's passport so that the defendant can use it to get a valid Driver's License in Georgia.

The defendant currently has no valid Driver's License or any other valid form of ID in his possession. This severely limits the defendant from commuting to pick up and drop off his kids from school and Daycare and to pursue a means to earn an income. In addition, not having a valid ID also prevents the defendant from boarding a flight, which he will need to do for reporting to his designated prison facility.

The Georgia Department of Motor Vehicles (DMV) requires all non-Citizens to present a physical copy of a valid Passport when applying for a license. The defendant requests this court for a temporary release of his passport to allow him to apply for a Driver's License.

In consultation with the pre-trial services and the government, a pre-trial officer from the Northern District of Georgia will accompany the defendant to the DMV to present the passport. The passport will thus remain in pre-trial custody through this process.

The government and pretrial services have no objections to the requested motion provided a pre-trial officer accompanies the defendant to the DMV with the passport.

RESPECTFULLY SUBMITTED,  
Puneet Dikshit

CC: Joshua Naftalis  
Matthew Podolsky  
Steven Boose

MEMO ENDORSED

*Allen M. McNeil*

9/6/2022  
Frankly, I view this request with some trepidation. It does not explain how Mr. Dikshit came to have no valid driver's license. Did his old license expire? Did he not drive prior to now? I would like more of an explanation before I act on this request. If I decide to grant it - a big "if" - it will be on the condition that Mr. Dikshit himself may not have custody of his passport; only the Protection officer may handle it.